



**BINNALL  
LAW GROUP**

P: 703-888-1943 • F: 703-888-1930  
717 King Street, Suite 200 • Alexandria, VA 22314

**Jason Greaves**  
PARTNER

D: 571-467-0003  
E: jason@binnall.com

May 28, 2024

**VIA ECF**

The Honorable Arun Subramanian  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Courtroom 15A  
New York, New York 10007-1312

**RE: *Flynn et al, v. Cable News Network, Inc.*, No. 1:21-cv-02587-AS-SLC  
Consent Letter-Motion Extension to File Response**

Dear Judge Subramanian:

I represent Plaintiffs Jack Flynn and Leslie Flynn in the above-referenced matter. With Defendant's consent, I write to request an [extension of thirty \(30\) days to file Plaintiff's response to Defendant's Motion for Attorney Fees](#). The original deadline for this response would be May 28, 2024. There are no other deadlines that would be affected by this extension of time and there are no other appearances before the Court currently scheduled.

This extension request is supported by good cause. Defendant has requested fees totaling a significant amount based upon the application of a Rhode Island state law. This extension will allow time for Plaintiffs to adequately research and prepare a thorough response on this critical issue. Neither party will be prejudiced by this extension of time as Defendant has consented to the extension. No previous extension of time has been requested for this response.

WHEREFORE, Plaintiffs respectfully request that this Court provide Plaintiff's 30-days extension to file their response to Defendant's Motion for Attorney Fees

Sincerely,

SO ORDERED.

Arun Subramanian, U.S.D.J.  
Date: May 29, 2024

Jason C. Greaves, *pro hac vice*  
Jared J. Roberts, *pro hac vice*  
BINNALL LAW GROUP, PLLC  
*Counsel for Plaintiffs*